

1 Z. Kathryn Branson, Bar No. 11540  
kbranson@littler.com  
2 Kelsey E. Stegall, Bar No. 14279  
kstegall@littler.com  
3 LITTLER MENDELSON P.C.  
3960 Howard Hughes Parkway  
4 Suite 300  
Las Vegas, Nevada 89169.5937  
5 Telephone: 702.862.8800  
Fax No.: 702.862.8811  
6

7 Attorneys for Defendant  
VIRTUAL GUARD, INC.

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
10

11 DAWN YOSEF, an individual,  
12 Plaintiff,

13 v.

14 VIRTUAL GUARD, INC.;  
15 EMPLOYEE(S)/AGENT(S) DOES I-X; and  
16 ROE CORPORATIONS XI-XX, inclusive,  
17 Defendant.  
18

Case No. 2:21-cv-02052-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME FOR THE PARTIES TO  
FILE DISMISSAL DOCUMENTS**

**[FIRST REQUEST]**

19 Plaintiff DAWN YOSEF (“Plaintiff”) and VIRTUAL GUARD, INC. (“Defendant”), by and  
20 through their respective counsel of record, hereby stipulate and agree to extend the time to file the  
21 dismissal documents currently set for March 18, 2022, (ECF No. 14).

22 The parties are currently in the final stages of finalizing settlement and issuing the settlement  
23 payment and require a brief extension of time beyond the original March 18, 2022 deadline to do so.  
24 In part, this extension is necessary to account for the proscribed revocation period.

25 The parties have been diligently working to finalize the settlement agreement and payment,  
26 and they are confident that it will be fully executed with the corresponding payment delivered shortly.  
27 Accordingly, the parties request a 30-day extension from the Court’s March 18, 2022 deadline (*see*  
28 ECF No. 14) to allow for the revocation period to pass, fully execute the agreement, issue the

1 settlement payment, and file the dismissal paperwork. The parties therefore respectfully request the  
2 deadline to file the dismissal paperwork be extended to **Monday, April 18, 2022.**

3 This request is made in good faith and not for the purpose of delay.  
4

5 Dated: March 11, 2022

Dated: March 11, 2022

6 GABROY LAW OFFICES  
7

LITTLER MENDELSON P.C.

8 /s/ Christian Gabroy



9 Christian Gabroy, Esq. (#8805)  
Kaine Messer, Esq. (#14240)

Z. Kathryn Branson (#11540)  
Kelsey E. Stegall (#14279)

10 Attorneys for Plaintiff  
11 DAWN YOSEF

Attorneys for Defendant  
VIRTUAL GUARD, INC.

12  
13 **ORDER**

14 IT IS SO ORDERED.

15 Dated this 11th day of March, 2022.

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17   
18 UNITED STATES MAGISTRATE JUDGE  
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